

The Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

KENNETH WRIGHT, on his own behalf and on
behalf of other similarly situated persons,

Plaintiff,

v.

LYFT, INC., a Delaware corporation,

Defendant.

NO. 2:14-cv-00421-BJR

**JOINT MOTION TO STAY
PROCEEDINGS PENDING DECISION
ON FINAL APPROVAL OF
PROPOSED SETTLEMENT**

NOTE ON MOTION CALENDAR:
SEPTEMBER 14, 2018

1 Plaintiff Kenneth Wright, through his counsel Donald W. Heyrich and Peter Stutheit, and
 2 Defendant Lyft, Inc., through its counsel Archis A. Parasharami of Mayer Brown LLP, and
 3 Bradley S. Keller and Keith D. Petrak of Byrnes Keller Cromwell LLP, respectfully submit this
 4 joint motion to stay proceedings. On July 23, 2018, the parties informed the Court that they have
 5 reached a settlement in principle in this action. Dkt. No. 85. In light of this settlement—which
 6 would resolve the claims of a proposed state-wide class of Washington residents—the parties ask
 7 the Court to stay further proceedings in this case (including all deadlines) so that the parties may
 8 finalize drafting a settlement and the plaintiff may file a motion for preliminary approval of the
 9 settlement. The parties anticipate that the plaintiff will be able to file a motion for preliminary
 10 approval of the settlement within the next 45 days.

12 The parties therefore respectfully request that the Court enter a stay of all proceedings
 13 and continue all deadlines until a ruling on motions for preliminary approval (and, if appropriate)
 14 final approval of the settlement.

15 Respectfully submitted,

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18 ***Counsel for Plaintiff Kenneth Wright***

19 /s/ Donald W. Heyrich

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CERTIFICATE OF SERVICE

The undersigned attorney certifies that on the 14th day of September, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel on record in the matter.

/s/ Archis A. Parasharami

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